

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

CASE NO. 1:19-CV-593-LCB-JLW

ZION WILLIAMSON,

Plaintiff,

v.

PRIME SPORTS MARKETING, LLC, and
GINA FORD,

Defendants.

**PLAINTIFF’S MOTION FOR
PARTIAL JUDGMENT ON
THE PLEADINGS
(Fed. R. Civ. P. 12(c))**

Pursuant to Federal Rule of Civil Procedure 12(c), Plaintiff Zion Williamson, through counsel, hereby moves this Court for judgment on the pleadings with respect to Plaintiff’s claim for Declaratory Judgment (Count I) on the basis that the undisputed facts in the pleadings reveal no genuine issues of material fact and Plaintiff is entitled to judgment as a matter of law. The accompanying Memorandum provides additional support for this Motion.

WHEREFORE, Defendant requests that the Court enter an Order as follows:

- (1) Granting judgment in Plaintiff’s favor on his claim for Declaratory Judgment (Count I) in the First Amended Complaint;
- (2) Declaring that the April 20, 2019 Joint Marketing and Branding Agreement between Plaintiff and Defendants is void or voidable and voided by Mr. Williamson; and
- (3) Granting to Plaintiff such other and further relief as the Court deems just and appropriate.

This 20th day of May 2020.

/s/ John R. Wester

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*Local Rule 83.1(d) Special Appearance
filed.

**Local Rule 83.1(d) Special Appearance
forthcoming.

Attorneys for Plaintiff